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April 10, 2015

Mr. Scott Pruitt, Director  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Dear Mr.

My name is Alfred Dentone and I'm the founder and president of a company called Inert Gas Injection, LLC (IGI, LLC). I have invented a device that utilizes Carbon Dioxide to control burrowing rodent pests and other pests. The device is called The Eliminator® and delivers Carbon Dioxide into the burrows, puts the rodent to sleep then they suffocate from lack of oxygen.

IGI has already received from the EPA a label for use of IGI Carbon Dioxide as a fumigant for various pests which took over a year to complete and OR, WA and now CA have approved the label in a little over 5 weeks.

The purpose of my mentioning this is to facilitate an understanding that I know what it takes to get a pesticide label approved by the various Federal and State agencies. What I have only recently been informed about absolutely infuriates me.

When I was told by the PRIA Committee within the EPA reviewing our simple label addition to include the burrowing rodents mentioned above I was told that this is just a simple label addition and it would only take 3 months. All I had to do was submit a few EPA forms and the field trial proving that our method worked and a payment for EPA reviewing the application.

As we were preparing the documents for review I received an email from the Manager of the same PRIA group telling me that he and the other Manager made a terrible mistake and that it was now going to take 12 to 15 months to get approval of the exact same label addition because it was going to now be classified as a "new use- outdoors". On top of the fee for review I now also had to retain a consultancy firm because of the complexity in reviewing this new label addition. My companies cost to hire this firm would be about \$60,000.00 for exactly the same Carbon Dioxide. This manager apologized to me in writing and during a phone call told me that the committee all knew that this was just Carbon Dioxide but they had to do what they were told to do from above and that this is the law as defined by the EPA. The EPA PRIA group is so blinded by their own mismanagement that they MUST consider Carbon Dioxide, the gas we exhale and that plants need to survive, to be exactly the same as all of the incredibly dangerous toxic gases and baits that they have approved in the past.

Given this gross abuse of power and with you and the Trump Administration finally bringing changes to this horribly mismanaged bureaucracy I decided to communicate with you to see if there is anything that that can be done to stop this type of lunacy. Is there nothing that you and your organization can do to assist us in this matter of allowing our product, utilizing only Carbon Dioxide, to control burrowing rodents? We actually now have an ORGANIC version of Carbon Dioxide available to those growers and facilities that are organic in nature. They have no other efficacious product to use and are losing up to 40% of their trees, vines and other crops on an annual basis. To the best of my

knowledge this would be the first time that such a product has existed and still that doesn't matter when it comes to having a label addition approved. Absolutely incredible!

I am truly fearful that without intelligent intervention my company and I personally will not survive long enough to get our Carbon Dioxide product to market which would allow us to generate income. It is time for the industry to have access to this product in place of the poison gasses and baits they are currently forced to use. Carbon Dioxide is safe for the user and the environment and Carbon Dioxide is in the air we breathe. The worst part is that these Federal employees don't really seem to know what they are supposed to do. On more than one occasion I have been told one thing, we follow their instructions and proceed down that path to only be told a month or two later, "Whoops, sorry that wasn't right and now here is what you must do". Our research has been set back over a year because of these "rule" reversals and has cost my company more than \$100,000. It appears that the EPA staff I have had to work with are merely sitting at their desk, complaining about how busy they are and clocking their time to get to their retirement from this government job. The very worst thing about all of this is that no one, and I mean no one, is willing to rock the boat and say that this is wrong. They just go with the flow so that at the end of the day Flint, MI occurs again.

In closing, I have complete email documentation for all of the claims that I have made above and I would very much appreciate having a discussion with you or an individual of your choosing so that we may see an end to this lunacy and I have clarification on how to proceed forward.

Regards,

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